

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

|                    |   |              |
|--------------------|---|--------------|
| THE PORTLAND MINT, | ) |              |
|                    | ) |              |
| Plaintiff,         | ) |              |
|                    | ) | No. 20-518C  |
| v.                 | ) | (Judge Horn) |
|                    | ) |              |
| UNITED STATES,     | ) |              |
|                    | ) |              |
| Defendant.         | ) |              |

DEFENDANT'S UNOPPOSED MOTION FOR AN  
ENLARGEMENT OF TIME TO RESPOND TO PLAINTIFF'S AMENDED COMPLAINT

Pursuant to Rule 6(b) of the Rules of the United States Court of Federal Claims, defendant, the United States, respectfully requests a 21-day enlargement of time, to and including February 12, 2021, within which to file our reply to plaintiff's response to our motion to dismiss plaintiff's amended complaint. Our reply is currently due January 22, 2021. This is our first request for an enlargement of time for this purpose. Counsel for Portland Mint has indicated that plaintiff does not oppose this motion.

Good cause exists to grant this request. This request is necessary to enable counsel to complete the United States' reply. Plaintiff's response was filed on January 15, 2021, and counsel reviewed the response and forwarded it to counsel for the United States Mint. Additional time is necessary for the United States Mint to provide its comments upon the plaintiff's response brief. Including the agency's comments into our reply brief will result in a more thorough presentation of the issues to this Court. Further, upon receipt of the agency's final comments, undersigned counsel will require additional time to review, reconcile, and incorporate those comments into the reply and to obtain the necessary supervisory review.

In addition, an enlargement of time is necessary due to the demands of other cases,

including filing a reply in support of a motion to stay and a motion to certify interlocutory appeal in *Abrantes v. United States*, No. 19-129C, on January 19, 2021; a reply in support of a motion to stay and a response to a cross-motion for equitable tolling in *Richmond v. United States*, No. 19-161C, on January 19, 2021, as well as a motion to certify an interlocutory appeal in that case on the same day; and preparation for an oral argument on the United States' motion to dismiss in *ZMP v. United States*, No. 20-183C, on January 22, 2021, as well as the two Federal holidays the week of January 18, 2021.

Accordingly, the undersigned needs additional time to complete the Government's response to the complaint, review the draft response, receive additional input from the agency, and obtain the necessary internal review.

For these reasons, we respectfully request that the Court grant this unopposed motion for an enlargement of time of 21 days, to and including February 12, 2021, within which to file our reply in support of our motion to dismiss.

Respectfully submitted,

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January 22, 2021

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